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May 17, 2021

**BY ECF**

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Alexander Anderson v. New York City Health and Hospital Corp., et ano.,  
16 Civ. 1051 (GBD) (KHP)

Dear Judge Daniels:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. I write this joint letter, on behalf and consent of all parties, to request an adjournment of the pretrial conference in this matter, presently scheduled for May 26, 2021, until June 23, 2021, or a later date and time convenient for the Court, as well as an extension of the parties' time to file a proposed joint pretrial order until seven days before the adjourned date of the pretrial conference. This is the parties' first request for an adjournment of the pretrial conference in this case.

The parties respectfully request this adjournment and extension in order to afford the parties sufficient time to draft and file a proposed joint pretrial order in advance of a pretrial conference before the Court. The parties sincerely apologize for their oversight in failing to file a joint pretrial order within 30 days of the close of fact discovery in this case, in accordance with the Court's Individual Rules, and for any delay or inconvenience caused to the Court by this oversight. The parties propose the following schedule for the exchange of a draft joint pretrial order, to ensure there are no further delays:

- Plaintiff to serve his draft joint pretrial order upon Defendants by: **May 28, 2021;**
- Defendants to serve their draft joint pretrial order upon Plaintiff by: **June 11, 2021;**
- Parties to meet and confer, and file final draft joint pretrial order by: **June 18, 2021;**

The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/ J. Kevin Shaffer

J. Kevin Shaffer

Assistant Corporation Counsel

cc: Delmas A. Costin (via ECF)  
Attorney for Plaintiff